

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2025 JUN 24 P 1:19

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 24-CR-170

v.

[18 U.S.C. §§ 371, 511, 514, 1001,
1028A, 1956, 2312, 2313, 2321, &
2(a); 21 U.S.C. §§ 841(a)(1),
841(b)(1)(A), 841(b)(1)(B), & 846]

DIAUNTE D. SHIELDS,
GEOFFREY HARVEY,
WILLIE BULLARD,
LASHAWN DAVIS, JR.,
BRANDON MULLINS,
NAKIYA WRIGHT,
CASHA GRIFFIN,
BRIANNA SHIELDS,
GERRICA BAKER,
DEON BROOKS,
[REDACTED]

[SEALED]

TASHAWN BROWN-SMITH,
DEQUAS CRAWFORD-HIGGS,
[REDACTED]

VASHAWN MILTON,
DEAMONTE LEE,
GLENN LARSEN,
KENNETH KILSON,
CHAZ HOLIFIELD,
MELIEK McCLARN,
TASHAY NORTHERN,
ESTEBAN CARDENAS, and
[REDACTED]

Defendants.

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about January 2019 through in or about February 2024, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
GEOFFREY HARVEY,
WILLIE BULLARD,
LASHAWN DAVIS, JR.,
BRANDON MULLINS,
NAKIYA WRIGHT,
CASHA GRIFFIN,
BRIANNA SHIELDS,
GERRICA BAKER,
DEON BROOKS,**

**TASHAWN BROWN-SMITH,
DEQUAS CRAWFORD-HIGGS,**

**VASHAWN MILTON,
DEAMONTE LEE,
GLENN LARSEN,
KENNETH KILSON,
CHAZ HOLIFIELD,
MELIEK McCLARN,
TASHAY NORTHERN,
ESTEBAN CARDENAS, and**

knowingly and willfully conspired with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States, namely:

- (a) to transport in interstate and foreign commerce a motor vehicle, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312;
- (b) to receive, possess, conceal, store, barter, sell, and dispose of any motor vehicle, which has crossed a State or United States boundary after being stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313;
- (c) to knowingly remove, obliterate, tamper with, and alter an identification number for a motor vehicle, in violation of Title 18, United States Code, Section 511(a)(1);

- (d) to print, process, produce, and otherwise make, and attempt and cause the same, within the United States, any false or fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme and artifice to be an actual security or other financial instrument issued under the authority of a State of the United States, with the intent to defraud, in violation of Title 18, United States Code, Section 514(a)(1);
- (e) to pass, utter, present, offer, broker, issue, and sell, and attempt and cause the same, and with like intent possesses, within the United States, any false and fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of a State of the United States, with the intent to defraud, in violation of Title 18, United States Code, Section 514(a)(2);
- (f) to utilize interstate and foreign commerce, including the use of the mails and wire, radio, and other electronic communication, to transmit, transport, ship, move, and transfer, and attempt and cause the same, to, from, and through the United States, any false and fictitious instrument, document, and other item appearing, representing, purporting, and contriving through scheme and artifice to be an actual security and other financial instrument issued under the authority of a State of the United States, with the intent to defraud, in violation of Title 18, United States Code, Section 514(a)(3);
- (g) to buy, receive, possess, and obtain control of, with intent to sell and otherwise dispose of, a motor vehicle and motor vehicle part, knowing that an identification number for such motor vehicle and part has been removed, obliterated, tampered with, and altered, in violation of Title 18, United States Code, Section 2321;
- (h) to knowingly and willfully make materially false statements and representations in a matter within the jurisdiction of the executive branch of the United States, in violation of Title 18, United States Code, Section 1001(a)(2);
- (i) to knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to an enumerated felony, in violation of Title 18, United States Code, Section 1028A(a)(1);
- (j) to knowingly import, export, and attempt to import and export any motor vehicle and part of any motor vehicle, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 553(a)(1);
- (k) to knowingly import, export, and attempt to import and export any motor vehicle and part of any motor vehicle, knowing that the identification number of such motor vehicle, equipment, and part has been removed, obliterated, tampered with, and altered, in violation of Title 18, United States Code, Section 553(a)(2); and
- (l) to distribute, possess, and attempt to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Manner and Means

2. The manner and means used to accomplish the objects of the conspiracy included, among other things:

- (a) The conspirators stole and directed others to steal motor vehicles.
- (b) The conspirators transported and arranged for the transport of stolen vehicles.
- (c) The conspirators received stolen vehicles.
- (d) The conspirators possessed stolen vehicles.
- (e) The conspirators concealed these stolen vehicles, including by altering the manufacturer's vehicle identification numbers, making false and fictitious motor vehicle titles, and presenting false and fictitious motor vehicle titles for registration, and directing others to do so.
- (f) The conspirators sold the stolen vehicles.
- (g) The conspirators transferred money, controlled substances, and other items to one another.

Acts in Furtherance

3. To further the conspiracy, the conspirators committed overt acts in the Eastern District of Wisconsin and elsewhere, including but not limited to the following:

- (a) on or about June 27, 2020, KENNETH KILSON sent a message to DIAUNTE SHIELDS offering to purchase four vehicles;
- (b) on or about November 27, 2020, MELIEK McCLARN sent a message to DIAUNTE SHIELDS with an address in Madison, Wisconsin for the transport of three vehicles from Georgia to Wisconsin;
- (c) on or about March 20, 2022, LASHAWN DAVIS, JR. attempted to steal a motor vehicle, namely, a 2020 Dodge Ram 3500 Limited assigned manufacturer vehicle identification number 3C63R3RL5LG219772, from a parking structure at the Milwaukee Mitchell International Airport located in Milwaukee, Wisconsin.
- (d) on or about July 11, 2022, BRANDON MULLINS made a fake Georgia title bearing vehicle identification number 2C3CDXGJ3LH212758 for a 2021 Dodge Charger Scat Pack;

- (e) on or about October 15, 2022, DIAUNTE SHIELDS sent GEOFFREY HARVEY a photograph of a windshield sticker bearing vehicle identification number 1FMEE5JR9LA57543; and
- (f) on or about December 12, 2022, a 2021 Dodge Challenger SRT Hellcat bearing assigned manufacturer vehicle identification number 2C3CDZL94MH536102 was transported by a car hauler from Milwaukee, Wisconsin to Florida.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 15, 2020, and on or about January 21, 2021, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
WILLIE BULLARD**

did transport in interstate commerce a motor vehicle, namely, a 2017 Jeep Grand Cherokee SRT assigned manufacturer vehicle identification number 1C4RJFDJ7HC653963, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 14, 2020, and on or about January 21, 2021, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
WILLIE BULLARD**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2017 Jeep Grand Cherokee SRT assigned manufacturer vehicle identification number 1C4RJFDJ7HC653963, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 28, 2022, and on or about October 10, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
TASHAWN BROWN-SMITH,
GEOFFREY HARVEY,
BRANDON MULLINS, and
CHAZ HOLIFIELD**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2019 Jeep Grand Cherokee Trackhawk assigned manufacturer vehicle identification number 1C4RJFN94KC743373, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 7, 2022, and on or about August 4, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
TASHAWN BROWN-SMITH,
GEOFFREY HARVEY, and
BRANDON MULLINS**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Dodge Charger Scat Pack assigned manufacturer vehicle identification number 2C3CDXGJ0MH639459, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 10, 2022, and on or about August 2, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDON MULLINS and
DIAUNTE D. SHIELDS,**

with intent to defraud, did print, process, produce, and otherwise make, and attempted and caused the same, within the United States, a false and fictitious instrument and document, namely, a Georgia title bearing vehicle identification number 2C3CDXGJ3LH212758, appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and financial instrument issued under the authority of a state of the United States.

In violation of Title 18, United States Code, Sections 514(a)(1) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 10, 2022, and on or about August 2, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDON MULLINS and
DIAUNTE D. SHIELDS,**

with intent to defraud, did utilize interstate commerce to transmit, transport, ship, move, and transfer, and attempted and caused the same, to, from, and through the United States, a false and fictitious instrument and document, namely, a Georgia title bearing vehicle identification number 2C3CDXGJ3LH212758, appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and financial instrument issued under the authority of a state of the United States.

In violation of Title 18, United States Code, Sections 514(a)(3) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 20, 2022, and on or about December 13, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS,
DIAUNTE D. SHIELDS, and
GEOFFREY HARVEY**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Dodge Challenger Hellcat Redeye assigned manufacturer vehicle identification number 2C3CDZL94MH536102, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 3, 2022, and on or about September 14, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
BRANDON MULLINS,
NAKIYA WRIGHT, and**

[REDACTED]

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2018 Jeep Grand Cherokee Trackhawk assigned manufacturer vehicle identification number 1C4RJFN97JC173948, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 8, 2022, and on or about September 10, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDON MULLINS and
DIAUNTE D. SHIELDS,**

with intent to defraud, did print, process, produce, and otherwise make, and attempted and caused the same, within the United States, a false and fictitious instrument and document, namely, a Georgia title bearing vehicle identification number 1C4RJFN94JC281718, appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and financial instrument issued under the authority of a state of the United States.

In violation of Title 18, United States Code, Sections 514(a)(1) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 9, 2022, and on or about September 12, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**BRANDON MULLINS and
DIAUNTE D. SHIELDS,**

with intent to defraud, did utilize interstate commerce to transmit, transport, ship, move, and transfer, and attempted and caused the same, to, from, and through the United States, a false and fictitious instrument and document, namely, a Georgia title bearing vehicle identification number 1C4RJFN94JC281718, appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and financial instrument issued under the authority of a state of the United States.

In violation of Title 18, United States Code, Sections 514(a)(3) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**NAKIYA WRIGHT and
DIAUNTE D. SHIELDS,**

with intent to defraud, did pass, present, offer, and broker, and attempted and caused the same, and with like intent possessed, within the United States, a false and fictitious instrument and document, namely, a Georgia title bearing vehicle identification number 1C4RJFN94JC281718, appearing, representing, purporting, and contriving through scheme and artifice, to be an actual security and financial instrument issued under the authority of a state of the United States.

In violation of Title 18, United States Code, Sections 514(a)(2) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 26, 2022, and on or about October 9, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS and
DIAUNTE D. SHIELDS**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR7NLA50199, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 11, 2022, and on or about October 15, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
GEOFFREY HARVEY**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR7NLA50199, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 26, 2022, and on or about March 23, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS,
DIAUNTE D. SHIELDS,
GERRICA BAKER, and
GEOFFREY HARVEY**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR7NLA50199, which had crossed a state and United States boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 14, 2022, and on or about March 23, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
GEOFFREY HARVEY**

did knowingly and intentionally buy, receive, possess, and obtain control of, with the intent to sell and otherwise dispose of, a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR7NLA50199, knowing that an identification number for such motor vehicle had been removed, obliterated, tampered with, and altered.

In violation of Title 18, United States Code, Sections 2321 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about October 9, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS and
DIAUNTE D. SHIELDS**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA50642, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 11, 2022, and on or about October 15, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
GEOFFREY HARVEY**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA50642, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about January 19, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS,
DIAUNTE D. SHIELDS,
GERRICA BAKER, and
GEOFFREY HARVEY**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA50642, which had crossed a state and United States boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about December 28, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS and
DIAUNTE D. SHIELDS**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA50737, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about December 28, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS,
DIAUNTE D. SHIELDS,
GERRICA BAKER,
LASHAWN DAVIS, JR., and
ESTEBAN CARDENAS**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA50737, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about October 22, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS and
DIAUNTE D. SHIELDS**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA51323, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 8, 2022, and on or about November 7, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DEON BROOKS,
DIAUNTE D. SHIELDS,
LASHAWN DAVIS, JR., and
GEOFFREY HARVEY**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA51323, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 30, 2022, and on or about November 7, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
LASHAWN DAVIS, JR., and
GEOFFREY HARVEY**

did transport in interstate commerce a motor vehicle, namely, a 2022 Ford Bronco Raptor assigned manufacturer vehicle identification number 1FMEE5JR9NLA51323, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 9, 2022, and on or about November 17, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
GERRICA BAKER, and**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Ram 1500 TRX assigned manufacturer vehicle identification number 1C6SRFU99MN813623, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about November 10, 2022, and on or about November 16, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**GEOFFREY HARVEY,
DIAUNTE D. SHIELDS,
GERRICA BAKER, and
LASHAWN DAVIS, JR.**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Chevrolet Tahoe Z71 assigned manufacturer vehicle identification number 1GNSKPKD8MR464688, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about November 10, 2022, and on or about November 16, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
LASHAWN DAVIS, JR.**

did transport in interstate commerce a motor vehicle, namely, a 2021 Chevrolet Tahoe Z71 assigned manufacturer vehicle identification number 1GNSKPKD8MR464688, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2022, in the State and Eastern District of Wisconsin,

NAKIYA WRIGHT

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by applying for an employer identification number for Hair Art Studios listing K.J. as the responsible party with the Internal Revenue Service, which was false because, as she then and there knew, K.J. was not the responsible party for Hair Art Studios.

In violation of Title 18, United States Code, Section 1001(a)(2) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2022, in the State and Eastern District of Wisconsin,

NAKIYA WRIGHT

knowingly possessed and used, without lawful authority, a means of identification of another person, specifically the name of K.J., during and in relation to the felony offense of false statement, in violation of 18 U.S.C. § 1001, as charged above in Count Twenty-Eight, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about November 29, 2022, and on or about March 23, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
GLENN LARSEN,
GEOFFREY HARVEY, and
BRANDON MULLINS**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2018 Jeep Grand Cherokee Trackhawk Supercharged assigned manufacturer vehicle identification number 1C4RJFN99JC224270, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2022, in the State and Eastern District of Wisconsin,

DIAUNTE D. SHIELDS

did knowingly and intentionally remove, obliterate, tamper with, and alter an identification number for a motor vehicle, namely, a 2018 Jeep Grand Cherokee Trackhawk Supercharged assigned manufacturer vehicle identification number 1C4RJFN99JC224270.

In violation of Title 18, United States Code, Sections 511(a)(1) and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about December 8, 2022, and on or about December 12, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS and
GEOFFREY HARVEY**

did transport in interstate commerce a motor vehicle, namely, a 2018 Jeep Grand Cherokee Trackhawk Supercharged assigned manufacturer vehicle identification number 1C4RJFN99JC224270, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 7, 2023, and on or about July 18, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
GEOFFREY HARVEY, and
NAKIYA WRIGHT**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2022 Chevrolet Corvette Stingray Convertible 2LT assigned manufacturer vehicle identification number 1G1YB3D45N5124151, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 2, 2023, and on or about June 3, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
BRIANNA SHIELDS, and
DEAMONTE LEE**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Dodge Charger Scat Pack assigned manufacturer vehicle identification number 2C3CDXGJ1MH569440, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 2, 2023, and on or about June 3, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**BRIANNA SHIELDS and
DEAMONTE LEE**

did transport in interstate commerce a motor vehicle, namely, a 2021 Dodge Charger Scat Pack assigned manufacturer vehicle identification number 2C3CDXGJ1MH569440, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2312 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about June 27, 2023, and on or about July 5, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
DEQUAS CRAWFORD-HIGGS, and
LASHAWN DAVIS, JR.**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Cadillac Escalade ESV assigned manufacturer vehicle identification number 1GYS4KKL3MR336429, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about August 7, 2023, and on or about August 15, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
LASHAWN DAVIS, JR., and
TASHAY NORTHERN**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2021 Chrysler 300 S assigned manufacturer vehicle identification number 2C3CCABG9MH549643, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 18, 2023, and on or about October 9, 2023, in the State and Eastern District of Wisconsin and elsewhere,

DIAUNTE D. SHIELDS and

[REDACTED]

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2023 Chevrolet Corvette Z06 assigned manufacturer vehicle identification number 1G1YD2D33P5603005, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 25, 2023, and on or about October 12, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
[REDACTED] and
[REDACTED]**

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2023 Chevrolet Corvette Z06 assigned manufacturer vehicle identification number 1G1YD2D33P5603005, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 21, 2023, and on or about December 6, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
VASHAWN MILTON, and**

[REDACTED]

received, possessed, concealed, stored, bartered, sold, and disposed of a motor vehicle, namely, a 2023 Chevrolet Tahoe Premier assigned manufacturer vehicle identification number 1GNSKSKD0PR253217, which had crossed a state boundary, knowing the same to have been stolen.

In violation of Title 18, United States Code, Sections 2313 and 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 18, 2022, in the State and Eastern District of Wisconsin and elsewhere,

**LASHAWN DAVIS, JR. and
DIAUNTE D. SHIELDS**

knowingly and intentionally attempted to possess with intent to distribute a controlled substance.

2. The offense involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2(a).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about August 27, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**LASHAWN DAVIS, JR. and
DIAUNTE D. SHIELDS**

knowingly and intentionally possessed with the intent to distribute a controlled substance.

2. The offense involved 40 grams or more of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2(a).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about September 10, 2021, and on or about November 27, 2023, in the State and Eastern District of Wisconsin and elsewhere,

**DIAUNTE D. SHIELDS,
CASHA GRIFFIN, and
NAKIYA WRIGHT**

did knowingly combine, conspire, and agree with each other and with others, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and 1957, namely:

- (a) to conduct financial transactions affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, namely, transportation of stolen vehicles, in violation of Title 18, United States Code, Section 2312; sale and receipt of stolen motor vehicles, in violation of Title 18, United States Code, Section 2313; trafficking in stolen motor vehicles, in violation of Title 18, United States Code, Section 2321; and possession and attempted possession of controlled substances with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1) and 846, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);
- (b) to conduct financial transactions affecting interstate commerce, which in fact involved the proceeds of specified unlawful activity, namely, transportation of stolen vehicles, in violation of Title 18, United States Code, Section 2312; sale and receipt of stolen motor vehicles, in violation of Title 18, United States Code, Section 2313; trafficking in stolen motor vehicles, in violation of Title 18, United States Code, Section 2321; and possession and attempted possession of controlled substances with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1) and 846, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and;

(c) to engage in monetary transactions in and affecting interstate commerce in criminal derived property that was of a value greater than \$10,000 and was derived from specified unlawful activity, namely, transportation of stolen vehicles, in violation of Title 18, United States Code, Section 2312; sale and receipt of stolen motor vehicles, in violation of Title 18, United States Code, Section 2313; trafficking in stolen motor vehicles, in violation of Title 18, United States Code, Section 2321; and possession and attempted possession of controlled substances with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1) and 846, in violation of Title 18, United States Code, Section 1957.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE NOTICE

1. Upon conviction of one or more offenses in violation of Title 21, United States Code, Sections 841 and 846, as charged in Counts 41 and 42 of this indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations, including but not limited to the following: a money judgment in the amount of proceeds the defendants obtained, directly or indirectly, as a result of the offense or offenses of conviction.

2. Upon conviction of the money laundering offense in violation of Title 18, United States Code, Section 1956, as charged in Count 43 of this indictment, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the offenses and any property involved in those offenses, including but not limited to: a money judgment for the sum of money equal to the amount of proceeds obtained as a result of the offense.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

CO-REPERSON

Dated: 6-29-23

lks/kmc
for RICHARD G. FROHLING
Acting United States Attorney